

April 3, 2003

My retirement 12 years ago was preceded by a 40 year career in the healthcare industry in which I specialized in aseptic practices and infection control. [My comments are predicated on the experiences and knowledge I acquired during that period of my life.]

It has been known for some time that the EPA intends to impose some restrictions on the use of chlorine bleach in laundering textile products because of concerns for the environmentally damaging effect it has on water and fish. In the healthcare field, the detergent manufacturers servicing that segment of the market, have been promoting the use of new chemical formulations that exclude the use of chlorine bleach as a disinfecting agent. [What is disturbing is their use of a statement made by an EPA 'spokesman' that implies the agency's endorsement of its elimination. That inference is an issue unto itself. However,] what is a major matter of concern is whether or not the items processed in those new formulations can be considered to be suitable and safe for use. This is particularly true for those items that have been exposed to blood and may be contaminated with life threatening blood-borne pathogens.

Unfortunately, the individuals to whom these new detergents are being promoted are not clinically oriented and not familiar with the recently published studies that have demonstrated the ability of organisms such as methillin resistant staph aureus and viral resistant e-coli to survive for prolonged periods

of time on textile products commonly found in a healthcare setting. This is not to say that their presence alone can contribute to a patient infection, but what they can do is enhance the possibility of an infectious organism being transmitted to the patient by the healthcare personnel tending their needs. Particularly vulnerable are the aged and infirm whose immune response is not capable of fending off the challenge. Not to be overlooked are the significant costs of treating these patients that must be absorbed by our nation's financially overburdened healthcare delivery system.

All things considered, I submit that the EPA should require the manufacturers of the new variety of bleaching agents to document the ability of their products to disinfect the contaminated 'linens' as effectively as chlorine bleach.

I submit that
In the interim, whatever plans the agency may have on restricting the use of chlorine bleach, every healthcare oriented facility and those commercial operators processing 'linens' for healthcare facilities should be exempted from compliance. Quite to the contrary, if anything is to be mandated, it should be that all the textile items they process should include a cycle of chlorine bleach.

NLB:etb

Respectfully,


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